

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PETER M. GALLIGAN,

Plaintiff,

v.

ADTALEM GLOBAL EDUCATION  
INC., *et al.*,

Defendants.

Case No. 1:17-cv-06310

Hon. Joan H. Lefkow

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants Adtalem Global Education Inc. (ATGE), Adtalem Global Health, Inc. (AGH), and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (Ross or RUSVM) (collectively, "Defendants") respectfully move for an extension of time to answer Plaintiff's Second Amended Complaint and state as follows:

1. On March 3, 2018, Plaintiff filed a Second Amended Complaint. (ECF No. 32.)
2. On March 27, 2018, Defendants moved to dismiss the Second Amended Complaint in its entirety. (ECF No. 35.)
3. On February 4, 2019, the Court granted in part and denied in part Defendants' motion to dismiss. (ECF No. 48.)

4. The Court: (1) dismissed Counts 1 and 2 with prejudice; (2) dismissed Counts 3, 4, 5, 7, and 8 without prejudice; and (3) did not dismiss Counts 6 and 9. The Court also imposed certain restrictions on re-pleading Counts 3, 4 and 5, and allowed Plaintiff to proceed with Count 6 only on the theory that Ross breached the disability accommodation and anti-retaliation provisions of the student handbook. (*See id.*)

5. The Court originally set a status hearing for February 20, 2019 to discuss the remaining claims. (*Id.*) This hearing was subsequently rescheduled to March 6, 2019 at the request of the parties. (ECF No. 49.)

6. Under Federal Rule Civil Procedure 12(a)(4)(A), Defendants' deadline to answer Plaintiff's Second Amended Complaint is February 18, 2019.

7. Defendant requests a 30-day extension of time, until March 20, 2019, to answer Plaintiff's Second Amended Complaint. The 30-day extension will allow the parties to discuss the remaining claims with the Court on March 6, 2019 before any further action is taken in this lawsuit. This 30-day extension will also allow Plaintiff adequate time to decide whether he will be filing a Third Amended Complaint and will conserve Defendant's resources in the event that Plaintiff amends his pleading.

8. In the event that Plaintiff files a Third Amended Complaint before March 20, 2019, Defendant's answer deadline would be 14 days from the date of filing. *See Fed. R. Civ. Pro. 15(a)(3).*

9. The parties conferred about this request on February 7, 13, and 14, 2019 and Plaintiff does not oppose this request.

10. This is the first request for an extension of time in connection with Defendants' answer deadline. This request is made in good faith and not for purposes of delay. No other deadlines will be impacted by the request.

WHEREFORE, Defendants respectfully request that the Court extend the deadline for Defendants to answer Plaintiff's Second Amended Complaint by 30 days, until March 20, 2019.

**DATED: February 15, 2019**

Respectfully submitted,

ADTALEM GLOBAL EDUCATION INC.; ADTALEM GLOBAL HEALTH, INC.; ROSS UNIVERSITY SCHOOL OF MEDICINE SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LIMITED

By: s/Megan Troy

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**CERTIFICATE OF SERVICE**

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 15th day of February, 2019:

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*s/Megan Troy*